

## Privacy Policy

At Global Pacific Securities US, Inc. ("GPS"), we understand that confidentiality and security of the personal information ("Personal Information") that you share with us is important. GPS is committed to protecting the privacy of Personal Information, including Personal Information related to individuals who may be clients, employees, agents, job applicants or others inside or outside of GPS. That is why we have developed specific policies and practices designed to protect the privacy of your Personal Information. By opening an account at GPS or by utilizing the products, services and applications available through GPS, you have consented to the collection and use of your Personal Information in accordance with this privacy policy ("Privacy Policy" or "Policy"). We encourage you to read this Privacy Policy carefully.

This Policy is based on the privacy and data protection principles common to the countries in which we operate. This Policy is intended to summarize GPS's data protection practices generally and to advise our clients, prospective clients, job applicants, website visitors and other third parties about GPS's privacy policies that may be applicable to them.

This Policy is specifically addressed to those who provide Personal Information to GPS or who visit or use GPS's websites, trading platforms, and social media sites.

### Who is responsible for your Personal Information?

GPS is responsible for the Personal Information that we may collect in the manner discussed below. Specifically, your Personal Information will be controlled by GPS which is providing services or communication to you.

### How do we collect your Personal Information and what Personal Information do we collect?

GPS collects and processes Personal Information from you. This may include, among other things, information:

- provided during the GPS account application process or during use of any of GPS's website applications (for example, your name, email address, telephone number, birth date, tax ID number, investment objectives, etc.);
- acquired as a result of the transactions you conduct through the GPS system or in connection with services offered by GPS;
- received from consumer-reporting agencies;
- collected through Internet cookies (for further information on our use of cookies, please see our Cookie Policy).

### Are you required to provide Personal Information?

In order for you to utilize our services, you will provide us with your Personal Information entirely voluntarily. In most circumstances GPS cannot act without utilizing certain of your Personal Information, for example, because this Personal Information is required to process your instructions or orders or provide you with access to our services or marketing materials. In most cases, it will be impossible for us to provide the services to you without the relevant Personal Information.

### For what purposes will we use your Personal Information?

We may use your Personal Information for the following purposes ("Permitted Purposes"):

- To provide you with brokerage and other services available on our platforms, and/or to deal with any requests or inquiries you may have;
- To pursue legitimate interests, including to carry out, monitor and analyze our business or operations;
- To conduct our recruiting processes;
- To contact you (unless you tell us that you prefer us not to) regarding features and functionality that may be of interest to you;

- To enter into or carry out contracts of various kinds;
- To comply with applicable laws or regulations in the United States;
- For any other purpose for which your Personal Information was provided to us.

We may process your Personal Information for the following purposes

- To communicate with you through the channels you have approved to keep you up to date on the latest developments, announcements and other information about GPS services, products, and technologies;
- To conduct client surveys, marketing campaigns, market analysis, or promotional activities;
- To collect information about your preferences to create a user profile to personalize and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

With regard to marketing-related communication, you may opt out in writing at any time if you do not wish to receive further marketing-related communication from us. We like to keep our clients, personnel and other interested parties informed of company developments, including news relating to GPS that we believe is of interest to them. Where legally required, we will not use your Personal Information for taking any automated decisions affecting you or creating profiles other than described above.

Depending on which of the above Permitted Purposes we use your Personal Information for, we may process your Personal Information on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organization;
- To comply with our legal obligations (for example, to keep pension records or records for tax purposes);
- Because processing is necessary for the purposes of our legitimate interest or those of any thirdparty recipients that receive your Personal Information, provided that such interests are not overridden by your interests or fundamental rights and freedoms;
- Because processing is useful or necessary in our discretion and is not prohibited under the law of the relevant jurisdiction.

In addition, the processing may be based on your consent where you have expressly given that to us.

### **Who we share your Personal Information with, and in what circumstances?**

We may share your Personal Information in the following circumstances:

- We may share your Personal Information with affiliates with your prior consent for the purposes of exploring potential transactions that you may wish to pursue for your own account. Your consent may be by email or written and may be on a case-by-case basis or a blanket consent, at your option. Your consent will be in effect until otherwise rescinded by you in writing, with return receipt;
- We may share your Personal Information with companies providing services in the areas of fraud and crime prevention and with companies providing similar services, including financial institutions such as credit reference agencies and regulatory bodies;
- We may share your data with third parties to assist us with the conduct of our recruitment processes;
- Consistent with applicable law, we may share your Personal Information with courts, law enforcement authorities, regulators or attorneys or other parties for the establishment, exercise or defense of a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process;
- We may also use aggregated Personal Information and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

Otherwise, we will only disclose your Personal Information when you direct us or give us permission to do so, when we are allowed or required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

#### **Personal Information about other people that you provide to us**

If you provide Personal Information to us about someone else (such as one of your directors or employees or someone with whom you have business dealings), you must ensure that you are entitled to disclose that Personal Information to us and that, without our taking any further steps, we may collect, use and disclose that Personal Information as described in this Privacy Policy. In particular, you must ensure that the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our Personal Information disclosure practices (including disclosure to overseas recipients), any right the individual may have to obtain access to the Personal Information and make complaints about the handling of the Personal Information and the consequences if the Personal Information is not provided (such as our inability to provide services).

#### **Keeping Personal Information about you secure**

To the extent required by law, we will take appropriate technical and organizational measures to keep your Personal Information confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to Personal Information. Personal Information may be kept on our Information Technology systems, those of our contractors or in paper files.

#### **Updating your Personal Information**

If any of the Personal Information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request that you have made of us, please let us know by contacting GPS Client Service through the GPS website at [www.globalpacificsecurities.com](http://www.globalpacificsecurities.com). We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete Personal Information that you provide to us.

#### **How long do we retain your Personal Information?**

We retain your Personal Information in an identifiable form in accordance with our internal policies which establish general standards and procedures regarding the retention, handling, and disposition of your Personal Information. Personal Information is retained for as long as necessary to meet legal, regulatory, and business requirements. Retention periods may be extended if we are required to preserve your Personal Information in connection with litigation, investigations, and proceedings.

#### **Updates to this Privacy Policy**

This Privacy Policy was last updated April 15, 2021. We reserve the right to update and change this Privacy Policy from time to time, for example, in order to reflect any changes to the way in which we process your Personal Information or changing legal requirements. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on our website.

#### **How to contact us**

We welcome your views about our website and our Privacy Policy. If you have any questions about this Policy, please contact at [service@globalpacificsecurities.com](mailto:service@globalpacificsecurities.com)

#### **GPS Cookie Policy**

What are Cookies and Web Beacons?

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about website usage, e-mail response and tracking. Generally, cookies may contain information about your Internet Protocol ("IP") addresses, the region or general location where your computer or device is accessing the

internet, browser type, operating system and other usage information about the website or your usage of our services, including a history of the pages you view.

#### How We Use Cookies and Web Beacons

GPS collects information from cookies and web beacons and stores it in an internal database. This information is retained in accordance with our Privacy Policy. This website uses the following cookies and web beacons:

#### Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can configure your browser to block or alert you about these cookies, but certain areas of the site will not function properly. These cookies do not store any personal data.

#### Performance Cookies and Web Beacons

These cookies and web beacons allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information that these cookies and web beacons collect is aggregated and, therefore, anonymous. If you do not allow these cookies and web beacons our aggregated statistics will not have a record of your visit.

The website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how you use this website. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

#### Functional Cookies

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, some or all of these services may not function properly.

#### Targeting Cookies and Web Beacons

These cookies and web beacons may be set throughout our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. They do not store personal information that could identify you directly but are based on uniquely identifying your browser and internet device. If you do not allow these cookies and web beacons, you will experience less targeted advertising. The website does not track users when they cross to third party websites, does not provide targeted advertising to them, and therefore does not respond to Do Not Track ("DNT") signals.

#### Managing Your Cookie Preferences

You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. However, if you do decide to disable cookies you may not be able to access some areas of our website or the website may function incorrectly. To learn more about your ability to manage cookies and web beacons and how to disable them, please consult the privacy features in your browser or visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

This website may link through to third party websites which may also use cookies and web beacons over which we have no control. We recommend that you check the relevant third party's privacy policy for information about any cookies and web beacons that may be used.